

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

V.

Case No. 1:19-cv-01711

RIVER NORTH EQUITY LLC,  
EDWARD M. LICEAGA,  
MICHAEL A. CHAVEZ,  
NANOTECH ENTERTAINMENT, INC.,  
NANOTECH GAMING, INC.,  
DAVID R. FOLEY, LISA L. FOLEY,  
JEFFREY A. FOLEY, and  
BENNIE L. BLANKENSHIP,

Judge John F. Kness

Defendants,

**UNOPPOSED MOTION TO WITHDRAW**

Pursuant to Local Rule 83.17, Matthew Hiller, Jonathan D. King, Jason Hopkins, Marina Stefanova, and the law firm of DLA Piper LLP (US) (“Counsel”) file this motion seeking permission to withdraw as counsel for Defendant Michael Chavez and would show the Court as follows:

1. Local Rule 83.51.16 permits withdrawal if a client substantially fails to fulfill an agreement or obligation to the lawyer as to expenses or fees, or with client consent. L.R. 83.51.16(b)(1)(F), 83.51.16(b)(3). Both situations are present here. Specifically, Mr. Chavez has not substantially fulfilled his agreement and obligation to Counsel as to expenses or fees. Further, as evidenced by his signature below, Mr. Chavez consents to withdrawal.

2. Local Rule 83.51.16(d) requires Counsel to take reasonable steps to avoid foreseeable prejudice to Mr. Chavez's rights, and Counsel has done so. Specifically, Counsel has given Mr. Chavez due notice of this requested withdrawal, Counsel has advised Mr. Chavez of all upcoming deadlines, Counsel is delivering to Mr. Chavez the file relating to this case.

3. Pursuant to Local Rule 83.17, a Notification of Party Contact Information form is filed as an attachment to this motion.

4. On August 5, 2020, the undersigned discussed this motion with counsel for Plaintiff, who advised that this motion would not be opposed.

### **PRAYER**

Counsel respectfully request that the Court grant this Motion and allow their withdrawal from the representation of Mr. Chavez in this matter.

Dated: August 19, 2020

Respectfully submitted,

/s/ Jason M. Hopkins  
Richard Matthew Hiller  
Illinois Bar #6277662  
DLA Piper LLP (US)  
444 West Lake Street, Suite 900  
Chicago, IL 60606-0089  
Telephone: (312) 368-4000  
Facsimile: (312) 236-7516  
matt.hiller@dlapiper.com

Jason M. Hopkins (*Admitted Pro Hac Vice*)  
Teas Bar # 24059969  
Marina Stefanova (*Admitted Pro Hac Vice*)  
Texas Bar #24093200  
DLA Piper LLP (US)  
1900 North Pearl Street, Suite 2200  
Dallas, Texas 75201  
Telephone: (214) 743-4500  
Facsimile: (214) 743-4545  
jason.hopkins@dlapiper.com  
marina.stefanova@dlapiper.com

*Attorneys for Defendant Michael Chavez*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 19, 2020, a copy of the foregoing document was served on all of the following:

Via email

Daniel J. Hayes (hayesdj@sec.gov)  
Robert M. Moyer (moyer@sec.gov)  
Richard G. Stoltz (stoltzr@sec.gov)  
Christine B. Jeon (jeonc@sec.gov)  
175 West Jackson Boulevard, Suite 1450  
Chicago, Illinois 60604  
(312) 353-7390

*Attorneys for Plaintiff U.S. Securities and Exchange Commission*

Via email

Mark David Hunter (mhunter@htflawyers.com)  
Hunter Taubman Fischer & Li LLC  
2 Alhambra Plaza, Suite 650  
Coral Gables, Florida 33134  
(305) 629-1180

*Attorney for Defendants River North Equity LLC  
and Edward M. Liceaga*

Via email and UPS delivery

David Foley (david@hyperware.com)  
Lisa Foley (lisalyound@aol.com)  
311 Santa Rose Drive  
Los Gatos, California 95032

*Defendants David Foley and Lisa Foley, pro se*

Via email and UPS delivery

Michael Chavez  
8650 Spicewood Springs Rd  
Suite 145-572  
Austin, TX 78759

/s/ Jason M. Hopkins  
Jason M. Hopkins

**CLIENT CONSENT**

I consent to the withdrawal requested by my counsel.

A handwritten signature in blue ink, appearing to read "Michael Chavez", is positioned above a horizontal line.

Michael Chavez